DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

FACSIMILE TRANSMITTAL

TO:	(714) 541-8064.		
	Fax Phone Number	Floor/Room #	
	tax buone number		
	Name: EDWARD SIROTA		
	·	Title/Section	
	Agency: REMEDIAL ACTION	CORP.	
	Address:		
•	Phone #: ()		
FROM	1: (4/5) 568-3706	Floor/Room #	
	Fax Phone Number	•	
	Date:5/3/9/	Time Sent:	
	sender: <u>SUSAN</u> L.HuGO	- HAZ MAT SPECIALIST Title/Section	
	Phone #: ()	•	
•	Number of Pages Including Transmi	ttal Sheet: 3	
•	Special Instructions/Comments:		

REF./ COUNTY OF ALAMEDA OFFICE OF THE AUDITOR-CONTROLLER	DATE: 11 1 8 190
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HAYWARD COMMUNITY PARTNERS
PH. 415-948-4042
1001 PARMA WAY
LOS ALTOS, CA 94024

MEMO
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ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

May 2, 1991

Mr. Larry Schultz Union Bank 445 South Figueroa Street Los Angeles, California 90071 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Workplan For Site Investigation and Remediation at 1461 Park Avenue, Emeryville. California 94608

Dear Mr. Schultz:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the March, 1991 Remedial Action Corporation (RAC) workplan for the investigation and remediation of subsurface and groundwater contamination at the referenced site, as submitted under RAC cover dated March 19, 1991. Through telephone conversation with Mr. Edward Sirota of Remedial Action Corporation last April 15, 1991, the workplan was given a verbal approval and is acceptable provided the following specific areas of concern to this department are addressed.

- * The proposed excavation of contaminated soil at levels greater than 10 parts per million (ppm) Total Petroleum Hydrocarbon (TPH) is acceptable. Verification samples must be collected in the excavation zone and analyzed by a state certified lab.
- * After the removal of the two underground storage tanks last March, 1990, the contaminated soil was returned to the excavation. Guidelines established by the Regional Water Quality Control Board (RWQCB) do not allow reintroduction of soil into the tank pit if the TPH contaminant levels greater than 10 ppm are detected. This contaminated soil must be re-excavated and either treat or disposed of appropriately. Proper disposition of the soils must be supported by sample analysis by the state certified lab.
- * The verified downgradient flow of the groundwater must be determined at the site. If the verified downgradient location has been establish, then complete gradient data must be submitted and one monitoring well must be installed in the downgradient direction within ten feet of the former tank excavation. Construction of monitoring wells must be consistent with the Regional Water Quality Control Board guidelines. Levels and quality of groundwater must be monitored quarterly for a minimum of one year, even if no contamination is identified.

Mr. Larry Schultz May 2, 1991 Page 2 of 2

The need for additional investigative or remedial actions at this site will be based upon the data derived from this investigation You may implement remedial actions before approval of the workplan to diligently act in protecting the waters of the State. However, final concurrence by this office will depend on the extent to which the work done meets requirements of this letter.

This department will oversee the assessment and remediation for this site. However, RWQCB may choose to take over as lead agency if it is determined from this assessment that there has been substantial impact to ground water. The issuance of well drilling permits is through Alameda County Flood Control and Water Conservation District, Zone 7.

A report must be submitted within 30 days after completion of this initial investigation. Subsequent reports must be submitted quarterly until the site can be recommended for RWQCB "sign off". All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professional involved with the project. Copies of reports and proposals must also be submitted to RWQCB (attention: Lester Feldman).

Please be aware that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response to this request may result in civil penalties imposed by RWQCB, a maximum of \$1,000 per day. Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or the RWQCB.

Should you have any questions about this letter, please contact me at (415) 271-4320.

Sincerely, Lugo

Susan L. Hugo

Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health

Gil Jensen, District Attorney, Alameda County Consumer and Environmental Protection Agency

Lester Feldman, San Francisco Bay RWQCB Howard Hatamaya, State Department of Health Services Edward Sirota, Remedial Action Corporation files



ATC ENVIRONMENTAL INC.

6 August 1996 14543.0001

Alameda County Health Care Services Agency Department of Environmental Health 1131 Harbor Bay Parkway Alameda, California 94502-6577

Attention:

Ms. Susan L. Hugo, Senior Hazardous Materials Specialist

SUBJECT:

WORK PLAN TO CONDUCT AN ASTM TIER 2 RBCA EVALUATION AND CONDUCT AN INDOOR AIR OUALITY SURVEY

AT 1461 PARK AVENUE IN EMERYVILLE, CALIFORNIA

Dear Ms. Hugo:

ATC Environmental Inc. is pleased to submit this work plan on behalf of Union Bank of California (acting as trustee), to present the scope of work to conduct an American Society of Testing and Materials (ASTM) standard Risked Based Corrective Action (RCBA) Tier 2 evaluation and conduct an indoor air quality survey at the Watson Trust Property located at 1461 Park Avenue in Emeryville, California (site).

Previous work conducted at the site included the removal of two underground storage tanks (USTs) in March 1990. A 3,000-gallon gasoline UST was reported to be found in good condition. A 500-gallon UST, thought to have contained either diesel or gasoline, was reported to have showed evidence of leakage. The tanks were excavated, and soil samples and groundwater samples were collected. The soil and groundwater were reported to contain elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene and xylenes (BTEX). In September 1990, three groundwater monitoring wells were installed. Union Bank of California (as Trustee) has been required to conduct quarterly groundwater monitoring by the Alameda County Health Care Services Agency, Department of Environmental Health, UST Local Oversight Program (ACHCSA). Groundwater sampling was conducted by Blakely Environmental Inc. in May 1995 and July 1995. Applied Geosciences Inc. conducted groundwater sampling in November 1995 and January 1996. However, at the approval of Ms. Hugo of the ACHCSA, the quarterly groundwater monitoring has been suspended pending the outcome of recent activities related to potential closure of the case.

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Relatively low concentrations, to non-detect levels, of petroleum hydrocarbons and/or associated constituents were reported in the groundwater samples collected from the three monitoring wells during the most recent (January 1996) groundwater sampling event. The highest concentrations of petroleum hydrocarbons were reported in the sample collected from monitoring well MW1, located immediately adjacent to the former location of the UST, with concentrations attenuating rapidly in a down-gradient groundwater flow direction. Low concentrations of benzene and toluene were reported in MW-2, and only benzene was reported in MW-3. The concentrations of petroleum hydrocarbons and/or associated constituents have decreased, or have been relatively stable in the three monitoring wells, over the monitoring period.

Applied Geosciences Inc. conducted a well survey and an ASTM Tier 1 RBCA study for the site as documented in their report dated 28 March 1996. In the ACHCSA response to that report dated 11 June 1996, they expressed concern regarding the elevated concentrations of benzene detected in soil samples collected from beneath the building at 6 feet below the ground surface and the potential for benzene vapor migration from this soil to the building. Because of this, the ACHCSA requested that a Tier 2 evaluation using site specific conditions be conducted to facilitate case closure. It is our opinion that the Tier 2 evaluation may not generate Risk Based Screening Levels (RBSLs) that are sufficiently low to allow the soil to remain in-place without treatment. Therefore, it is proposed that if the site does not pass the Tier 2 evaluation, an indoor air quality survey would be conducted to collect actual field data related to the possible presence of benzene, toluene, ethylbenzene and xylenes (BTEX) in indoor air in the area of the building underlain by soil containing these constituents. Ms. Hugo stated that this approach seemed reasonable and would be acceptable.

OBJECTIVES

The objectives are to conduct an ASTM Tier 2 RBCA evaluation, and if necessary, an indoor air quality survey at the site.

SCOPE OF WORK

The scope of work within the approach includes the following:

ASTM Tier 2 RBCA Evaluation

An ASTM Tier 2 RBCA Evaluation will be conducted for the site using the Tier 2 RBCA tool kit provided by the ASTM. The program utilizes site specific data such as depth to groundwater, soil type, soil porosity, thickness of capillary fringe, and other data to back-calculate RBSLs for the site. The RBSLs calculated using site specific data will be compared to existing soil analytical data to determine if the soil can remain in-place.

Indoor Air Quality Survey

The indoor air quality (IAQ) survey will be conducted in the event that the site does not pass the ASTM Tier 2 RBCA evaluation. The IAQ is intended to assess the concentration of BTEX, if present, in the area of the building underlain by soil containing these constituents. The IAQ survey will be conducted by a Certified Industrial Hygienist associated with ATC Environmental PEL'S Inc. The survey will generally follow the National Institute for Occupational Safety and Health (NIOSH) Method 1501 Issue 2, dated 15 August 1994.

Air monitoring will be performed over a period of 3 separate days to obtain a statistically sound number of sampling events. Air sampling will be conducted in the building area which is underlain by soil containing elevated concentrations of BTEX. In general, two air samples and one blank sample will be collected over an 8 hour period on each of the 3 days. This sampling strategy is proposed to best represent expected normal work day exposure. The air samples will be collected using a low volume sampler operating at critical flow bifurcated into two separate critical orifices. Each orifice shall be calibrated separately using a primary calibration standard capable of accurately determining flow rate down to 10 milliliters per minute (ml/min.). Each of the calibrated orifices shall be attached to a Solid Sorbent tube with 100 milligrams (mg) primary and 50 mg secondary sorbent sections and placed at breathing zone height in the area of the building which is underlain by soil containing elevated concentrations of BTEX. Following each of the 3 sampling events, the samples will be capped and transported with the blank under chain-of-custody to an American Industrial Hygiene Association (AIHA) laboratory for analysis. The samples will be analyzed using gas chromatography.

Report Preparation

A letter report will be prepared following the completion of the above described scope of work. The report will include background data and a description of the Tier 1 evaluation previously performed, a summary of the currently proposed work including tables and figures, and conclusion and recommendations, if judged to be warranted.

SCHEDULE

ATC Environmental Inc. is prepared to commence work immediately upon receipt of approval from the ACHCSA. It is estimated that the proposed scope of work will be completed within 6 weeks of initiation.

On behalf of Union Bank of California (acting as trustee), we appreciate your prompt review of this submittal. If you have any questions regarding the information presented in this work plan, do not hesitate to call either of the undersigned at (408) 474-0280, or Ms. Susan E. McCormack at Union Bank of California directly at 818-810-6594.

Very truly yours,

ATC Environmental Inc.

ALEX J. GALLEGO, RG 6349

Wex 1. Dalles

Project Geologist

WILLIAM G. THE SKENS, CEG, CHG

Senior Project Manager

cc: Dr. Ravi Arulanantham, Regional Water Quality Control Board

Ms. Susan E. McCormack, Union Bank of California